

Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Periodic Reporting of Service Performance

Docket No. RM2022-7

PUBLIC REPRESENTATIVE COMMENTS

(June 3, 2022)

Kenneth E. Richardson  
Public Representative

Manon A. Boudreault  
Kenneth R. Moeller  
Assisting the Public Representative

901 New York Avenue, N.W.  
Suite 200  
Washington, D.C. 20268-0001  
Phone: (202) 789-6859  
[kennethrichardson@prc.gov](mailto:kennethrichardson@prc.gov)

## TABLE OF CONTENTS

	<i>Page</i>
I. INTRODUCTION.....	1
II. COMMENTS .....	3
A. Requiring Reporting of Average Actual Calendar Days to Delivery for All Market Dominant Products .....	3
B. Requiring Reporting Percentage-Point Impact Data for Root Causes of On-Time Performance Failures for All Market Dominant Products .....	6
C. Requiring Reporting of Performance for Each National Operating Plan Target for all Market Dominant Products.....	9
D. Reporting Requirements for Quality of Service of all Nonpostal Products .....	13
E. Requiring Regular Reporting of Volumes Excluded from Measurement.....	18
1. Whether to require reporting of mail excluded from measurement disaggregated by reasons of exclusion from measurement. ....	18
2. Modifications to the Postal Service's measurement systems.....	20
3. Requiring regular reporting of measured and unmeasured Full Service Intelligent Mail barcode (IMb) volumes.....	22
III. Online Dashboard Mandate for Postal Service .....	23
A. The PSRA requires the Postal Service to implement an online dashboard. ....	23
B. Requirements for Specific Data to Measure and Publish Performance Information for Dashboard .....	27
IV. CONCLUSION .....	28

Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Periodic Reporting of Service Performance

Docket No. RM2022-7

PUBLIC REPRESENTATIVE COMMENTS

(June 3, 2022)

On April 26, 2022, the Commission issued an advance notice of proposed rulemaking to revise its rules for the Postal Service's periodic service performance reporting.<sup>1</sup> The Commission intends to update its annual and periodic service performance reporting requirements for Market Dominant service products offered by the Postal Service. Those requirements are codified in 39 CFR part 3055, subparts A and B of the Commission's rules. Also, the recent Postal Service Reform Act of 2022 (PSRA) requires additional revisions to the Commission's service performance reporting requirements.<sup>2</sup>

I. INTRODUCTION

Pursuant to the PAEA, the Commission received responsibility under 39 U.S.C. § 3652(e)(2) to gather information to improve the quality, accuracy, or completeness of Postal Service reporting if the Commission determines the quality of service data has become significantly inaccurate, can be significantly improved, or revisions are necessary in the public interest. The purpose of reporting timely information is to enable the public to assess the lawfulness of the Postal Service's rates, but to avoid unnecessary or unwarranted Postal Service effort and expense, and to endeavor to protect the confidentiality of commercially sensitive information. *Id.*

---

<sup>1</sup> Advance Notice of Proposed Rulemaking to Revise Periodic Reporting of Service Performance, April 26, 2022 (Order No. 6160), (Advance Notice).

<sup>2</sup> Postal Service Reform Act of 2022, H.R. 3076, 117th Cong., 136 STAT. 1127, April 6, 2022.

The Commission is considering changes to its rules regarding Postal Service reporting rather than during an annual ACD proceeding. The Commission has previously stated, “Proposed changes to the reporting requirements appearing in 39 C.F.R. part 3055 are properly the subject of a rulemaking proceeding. See 39 U.S.C. § 3652(e)(2)(B)”. FY 2021 ACD at 143.

The Advance Notice summarizes the Commission’s history of its periodic service performance reporting requirements since the PAEA. The Commission requirements were initiated by Docket No. RM2009-11 in 2010.<sup>3</sup> Since then, there have been several modifications to the Postal Service’s service performance measurement systems. Internal methods to measure service performance for many products were introduced in FY 2019 and FY 2021. Service standards were modified in FY 2021 for First-Class Mail and end-to-end Periodicals. Advance Notice at 2-3.

The PSRA also requires modifications of the Commission’s rules in 39 CFR § 3055. The PSRA requires the Postal Service to establish an online “dashboard” of publicly available weekly service performance data. The Commission must provide recommendations to the Postal Service for modifying its measurement systems and for publishing its service performance information on the dashboard. 39 U.S.C. § 3692(b). The PSRA also provides authority to the Postal Service to offer certain new nonpostal services to the public and requires annual reporting by the Postal Service on the performance quality of its current nonpostal services. 39 U.S.C. § 3703-3705.

With this proceeding, the Commission seeks to update its service performance reporting requirements in 39 CFR § 3055. Primarily, the Commission requested comment on the usefulness, relevance, and frequency of potential new reporting requirements.

---

<sup>3</sup> Advance Notice at 2. See Docket No. RM2009-11, Order Establishing Final Rules Concerning Periodic Reporting of Service Performance Measurements and Customer Satisfaction, May 25, 2010 (Order No. 465).

## II. COMMENTS

*Overview.* When considering potential revisions to reporting requirements and particularly when recommending dashboard features, the Public Representative strongly recommends the Commission remain cognizant of the purpose of the reporting and especially the audience that uses and would use the performance information presented periodically to the Commission and those mailers who would use the dashboard. There are several audiences. The Postal Service has much more data available for its managers than it is required to report and, presumably, much of that data observed by management is actionable and available to enhance performance, improve operations and thus improve efficiency.

The data the Commission requires to be reported periodically has a more limited purpose. It provides the Commission and interested members of the public and Congress a yardstick to measure improvements or problems over time in service performance to assist in the oversight of the Postal Service. A third audience of Postal Service data reporting consists of sophisticated commercial mailers of invoices, advertisements, parcels and Periodicals mailers concerned with mailing dates to ensure their mail will reach the intended recipients in a timely manner without undue financial expense or loss. The fourth major audience for the data consists of primarily individual First-Class mailers of letters, cards or small parcels who may visit the dashboard to determine when a mailpiece addressed to a ZIP Code or region can be expected to be delivered. The Commission must keep in mind the necessity for the reporting and the countervailing expense of reporting that data.

### A. Requiring Reporting of Average Actual Calendar Days to Delivery for All Market Dominant Products

The Commission points out that the statistic of average actual calendar days to delivery for all market dominant products is often cited by the Postal Service in its press releases and that it is easily understood by the public as a picture of the actual service being provided at any given time. Advance Notice at 5. The Commission asks for comment on

whether its rules should be amended to require the Postal Service to report this information regularly.

The Public Representative does not support revising 39 CFR 3055, Parts A and B to require the Postal Service to report average actual calendar days to delivery for an overall combined measured Market Dominant products score. The Public Representative agrees with the Commission that such a statistic is easily absorbed by the public and appears to provide a picture of the actual service being provided. However, there is no assurance that this number reported by the Postal Service in its press releases meets the high standards the Commission requires of the Postal Service when regularly reporting its performance to the Commission.

It is presumed that the overall average actual calendar days to delivery can be readily calculated by the Postal Service from the data of various products for which performance days results are available. In this respect, adding that statistic complies with 39 U.S.C. § 3652 to avoid unnecessary and unwarranted Postal Service effort and expense to obtain information, nor would it violate the confidentiality of sensitive information. It is more difficult to determine that such additional general information is needed to assess the lawfulness of Postal Service rates. See Advance Notice at 2. The PSRA does not specifically require such additional reporting.

A simple “average of calendar days” is likely to have different meanings to various members of the public, depending upon their familiarity with the measurement methods the Postal Service applies. Averages and composite scores may be misleading to some or many when the individual Market Dominant product/service standard delivery days experience varies from the overall Market Dominant composite score.<sup>4</sup> An obvious simple example is that while the Postal Service does not count Sundays and holidays in its days for delivery, the reference to calendar days could be misconstrued by many as including such days, and

---

<sup>4</sup> Compare the Market Dominant Composite and Marketing Mail and Periodicals (combined) Composite service-performance on-time result (approximately 85 and 87 percent, respectively) with the Periodicals service-performance on-time results (approximately 75 percent). See *United States Postal Service Fiscal Year 2021 Annual Report to Congress at 34* and FY 2021 ACD at 182; Docket No. ACR2021, Library Reference USPS-FY22-17, December 29, 2021, Zip file “FY21.17.Annual.Report.zip,” PDF file “FY 2021 Annual Report to Congress.pdf.”

this Public Representative is not entirely certain and perhaps misled by the Commission's including the words "calendar days."

The Commission's current rules for annual and quarterly reports require "[d]ocumentation showing how data reported at a given level of aggregation were derived from data reported at greater levels of disaggregation." 39 CFR §§ 3055.2(j), 3055.31(d). Such a rule would stabilize the use of an underlying methodology for calculating the average actual calendar days. A caveat is that such averaging can be misleading as it smooths out the highs and lows of various product delivery times.<sup>5</sup> The average will remain relatively stable unless significant changes occur in the delivery days of several products.

It is important to note that reporting service performance at the national, quarterly and annual aggregated level, may not reflect actual experience for subsets of different users and different products at the weekly and disaggregated geographic levels when and where differences exist. For these reasons, very little emphasis should be placed upon a statistic for average calendar days. On the other hand, to ensure that such a statistic when calculated for public dissemination in press releases by the Postal Service is consistent, Commission rules requiring regular reporting of average actual calendar days as defined by the Commission would be useful in the public interest by standardizing such a term. Period-to-period changes in average actual calendar days to delivery are very likely to be minimal, amounting to no more than tenths of a day over time, except in unusual times such as the Covid-19 pandemic period. For this reason, the Commission ought to refrain from placing any emphasis on the actual average number of calendar days to delivery except as a long-term trend line over years.

---

<sup>5</sup> For example, given the large number of Marketing Mail products in service-performance measurement with 3-5 day delivery service standards, a combined Marketing Mail and Periodicals on-time service performance score and average delivery days calculation would be more likely reflective of the overall Marketing Mail delivery days experience rather than the Periodicals delivery days experience. See USPS Periodic Report, FY 2022 Q2 Service Performance Measurement System – Cover Letter and Audit Report, Audit Response and Measured/Unmeasured Volumes Report, May 31, 2022, Excel file "FY22 Q2\_MeasUnmeasVolRpt.xlsx." <https://www.prc.gov/dockets/document/121889>.

B. Requiring Reporting Percentage-Point Impact Data for Root Causes of On-Time Performance Failures for All Market Dominant Products

The Advance Notice points out that the Postal Service provided certain percentage point impact data in its FY 2021 Annual Compliance Review report. A significant amount of information was provided in that proceeding by the Postal Service concerning root cause failure for many Market Dominant products. For instance, it provided data on Single-Piece Letters/Postcards for the top five root causes for their failure to be delivered on time in FY 2021. Advance Notice at 5.<sup>6</sup> The FY 2021 ACD also describes in several tables and analyzes root causes for Presorted Letters/Postcards on-time delivery failures. *Id.* at 152-5.<sup>7</sup>

Postal Service data illustrate that the top five root causes of failures to meet service standards for 3-5-Day Single-Piece Letters/Postcards remained similar in FY 2020 and FY 2021; however, First Mile failures replaced Last Mile failures in the top five root causes. *Id.* at 226. Figure V-14 displays the top five root causes for the failure of 3-5-Day Single-Piece Letters/Postcards to be delivered on time in FY 2021, along with the corresponding point impact and percent change from FY 2020. FY 2021 ACD at 149.

The Postal Service's data illustrate that the rankings for the top five root causes of failures to meet service standards for each service standard category of Presorted Letters/Postcards changed slightly from FY 2020 to FY 2021. Figure V-16 displays the top five root causes for Presorted Letters/Postcards in FY 2021 nationwide, along with corresponding data for FY 2020. *Id.* at 153.

Also, the Postal Service's data illustrate that point impact results increased for most root causes associated with both retail and commercial categories of Flats. *Id.* at 156-160.

In addition, the Postal Service reports that it implemented root cause reporting for Outbound Single-Piece International beginning in Quarter 3 of FY 2021.<sup>239</sup> *Id.* at 162.

---

<sup>6</sup> See Docket No. ACR2021, Annual Compliance Determination, March 29, 2022, at 150 (FY 2021 ACD).

<sup>7</sup> See also USPS-LR21-29, Preface at 2, stating, "USPS-FY21-29 also includes certain data on root cause point impacts for First-Class Mail, Periodicals, and Marketing Mail as requested in the FY 2020 ACD (at 183, 198, & 193, respectively) (note that such data are not available at all product levels), as well as an evaluation of the feasibility and status of efforts to develop point impact data for Inbound Letter Post and Outbound Single-Piece First-Class Mail International Mail as requested in the FY 2020 ACD (at 184).



Because the point impact data the Postal Service submitted for international mail products in FY 2021 only covers Quarters 3 and 4, the data are not representative of service performance throughout the entirety of FY 2021. Therefore, the Commission was unable to meaningfully analyze the top root causes and point impacts for international mail products in FY 2021. The Commission stated that it will continue to monitor the point impact data and seek to identify relevant trends in future fiscal years. *Id.* at 164.

As directed in the FY 2020 ACD, for USPS Marketing Mail products that failed to achieve their on-time service performance targets in FY 2021, the Postal Service provided data with respect to the top five root cause point impacts for those products.<sup>8</sup> The point impact data provided by the Postal Service for USPS Marketing Mail were differentiated by shape (letter-shaped and flat-shaped mailpieces) and origin-versus destination-entry, rather than product.<sup>9</sup>

The FY 2021 ACD presents top five root causes for the failure of In-County and Outside County Periodicals to be delivered on time in FY 2021, along with the corresponding change from FY 2020. *Id.* at 185-186.

In response to an information request, the Postal Service produced root cause point impact data for BPM Flats in FY 2020 and FY 2021. Response to CHIR No. 11, question 13. Figure V-26 presents the top five root causes for the failure of BPM Flats product to be delivered on time in FY 2021, with the corresponding change from FY 2020. *Id.* at 193.

As for Special Services, the Postal Service did not supply any root cause information in the FY 2021 ACD proceeding.

Given the difficulties and inability of the Postal Service to measure the impact of its initiatives to improve service throughout its system, the Commission's enhanced focus on root causes of failures would provide needed information that will measure the improvements in service resulting from reduced percentages of root cause of failures. However, these are styled in the form of percentages of root cause failures and do not measure the absolute service improvements, only the relative movement of the causes of service failures. Thus,

---

<sup>8</sup> *Id.* at 171. See Library Reference USPS-FY21-29, Excel file "FY21 Marketing Mail Root Cause.xlsx."

<sup>9</sup> *Id.* at 175. Library Reference USPS-FY21-29 Preface at 3.

this information is helpful, but a change in the relative percentages of root causes for service failures will do little to explain the underlying reasons for improved or declining service.

The Public Representative therefore supports codifying the root cause point impact reporting (number of percentage points by which on-time performance decreased) and agrees that these data are useful in isolating significant drivers of delay for an individual product.<sup>10</sup> Percentage point impact data is extremely useful as demonstrated by the Commission's heavy focus on the information provided in the FY 2021 ACR. Much of the root cause information was acquired during the ACR proceeding, often with CHIR's issued during the ACD proceeding as detailed in the FY 2021 ACD.<sup>11</sup>

New rules requiring reporting of root cause failures for all Market Dominant products would not add significantly to the efforts the Postal Service expends during the annual ACD proceedings. The Commission does not indicate the timing of the reports it would like to include in its rules. If the Commission is considering adding this useful information to its rules for Annual Reporting, the additional effort by the Postal Service would be minimal. The Postal Service would be able to plan its presentation in advance of the Annual Compliance Report rather than awaiting CHIRs that may deviate in their requests from time to time, making advance planning more difficult. The Public Representative also suggests that the rules specify these data be provided at the most disaggregated level possible/useful to the public and mailers. At minimum, the data should be reported quarterly and annually by legacy District and Area-geographic levels. That data would better demonstrate the seasonal changes in root causes of delivery failures and could be valuable to Postal Service management if not already produced for in-house review. However useful a root-cause impact report may be, the report primarily serves Postal Service management and the

---

<sup>10</sup> FY 2021 ACD at 150.

<sup>11</sup> For instance, "[T]o facilitate the consistent monitoring of First-Class Mail service performance (particularly for Single-Piece Letters/Postcards), the Commission directed the Postal Service to provide Area- and District-level data concerning: the top five root cause point impacts for First-Class Mail." FY 2021 ACD at 139-40, 182-183; Also, "As directed in the FY 2020 ACD, the Postal Service provided evaluations of its nationwide initiatives in FY 2021 to improve transit and Last Mile performance and its Division-level progress in addressing the top root causes of failure to deliver First-Class Mail on time." FY 2021 ACD at 141.

Commission, it would not be of much interest to mailers and not necessary for the dashboard.

C. Requiring Reporting of Performance for Each National Operating Plan Target for all Market Dominant Products

The Advance Notice states that “the Commission intends to require the Postal Service to report the performance for each national operating plan target for all Market Dominant products.” Advance Notice at 5. This is also referred to as the 24-Hour Clock. To facilitate the consistent monitoring of First-Class Mail service performance (particularly for Single-Piece Letters/Postcards), the Commission in the FY 2020 ACD directed the Postal Service to provide, *inter alia*, Area-level and District-level data concerning the performance for each national operating plan target; and the 10 facilities with the most failures in meeting each national operating plan target during FY 2021. FY 2021 ACD at 138-139, 182-83. That information was again provided in Docket No. ACR2021 only for First-Class Mail products.<sup>12</sup> Such data was not requested and not provided for the other Market Dominant products.

The FY 2021 ACD directed the Postal Service to continue to provide First-Class Mail data after the ACD for FY 2022, Quarters 1 and 2 and for the mid-year within 90 days after the date of the ACD. It also directed the data to be filed for Quarters 3 and 4 annualized (data aggregated for all four quarters) for FY 2022 and to file that data with the FY 2022 ACR. *Id.* at 167.

Three types of data relating to the National Operating Plan are to be filed. *Id.*, items 3, 4 and 5:

*The number of CLTs (any HCR that is late by more than 4 hours), presented for the nation, each Area, and each District.*<sup>13</sup>

*The performance for each national operating plan target (also referred to as the 24-Hour Clock national clearance goals), presented for the nation, each Area, and each District.*<sup>14</sup>

---

<sup>12</sup> Data was provided in Library Reference USPS-FY21-29 and USPS-FY21-NP30. See *id.* at 167, notes 253-255.

<sup>13</sup> See, e.g., Library Reference USPS-FY21-29, Excel file “FY21 FCM Q3 CLT.xlsx.”

*The 10 facilities with the most failures in meeting each of the 24-Hour Clock national clearance goals during FY 2022. For each facility identified,... the number of times that the facility failed to meet that national clearance goal during FY 2022, and the corresponding number of times that the facility failed to meet that national clearance goal during FY 2021.*<sup>15</sup>

The FY 2021 ACD did not discuss the 24-Hour Clock data at length, but the FY 2017 ACD included about 13 pages of discussion and analysis. FY 2017 ACD at 129-142. Data pertaining to Performance against National Operating Plan Targets has been submitted by the Postal Service per Commission request, as part of the Commission's ACR process since ACR 2015. This data measures performance of mail processing activities at mail processing facilities by district on a quarterly basis. It also includes semi-annual and annual aggregations as well as geographic aggregations of the data to the area and national levels. The specific mail processing activities measured include mail cancelling, Outgoing Primary sortation, Outgoing Secondary sortation, assignment to commercial or FedEx air transport, clearance of Managed Mail, Second pass Delivery Point Sequence (DPS) and Carrier return times from their delivery routes. Each of these processing plant operations has a target time (24-Hr clock time) for completion. The performance scores reported are the percent of time the 24-hr clock-time target is met. Further detail of these processing performance measures is shown in the Table below. As the Table indicates, these operations all apply to First-Class Single-Piece mail except, as noted, for Assignment of mail to either Commercial or FedEx air routing. The four processing actions identified by the Postal Service as areas of specific concern are bold in the Table.

In the ACD 2017, the Commission specifically observed that "With regard to the 24-Hour Clock processing metrics, the Commission notes that some measurements include several different types of mail products and classes. For each metric, First-Class Mail Single-Piece Letters/Postcards comprise at least some of the applicable mail population measured. For the Postal Service to be responsive to the Commission's evaluation of

---

<sup>14</sup> See, e.g., Library Reference USPS-FY21-29, Excel file "FY21 FCM Q4 24 hr clock.xlsx."

<sup>15</sup> Library Reference USPS-FY21-NP30, Excel file "NONPUBLIC FCM Q5 - Facility Failures.xlsx."

service performance for each Market Dominant product, it should consider designing metrics that highlight data specific to a particular product.” ACD 2017 at 128.

### 24-Hour Clock

Processing Action	Description of Measurement	Percentage Clearance Target	Time Clearance Target (hours)
Cancelled	Measures the percentage of First-Class Mail Single-Piece Letters/Postcards with cancelled postage by the designated clearance time.	80	20:00
Outgoing Primary Cleared	<b>Measures the percentage of First-Class Mail Single-Piece Letters/Postcards and Presorted Letters/Postcards that have received a primary sortation by the designated clearance time.</b>	95	24:00
Outgoing Secondary Cleared	Measures the percentage of First-Class Mail Single-Piece Letters/Postcards and Presorted Letters/Postcards that have received a secondary sortation by the designated clearance time.	95	00:30
Assignment to Commercial/FedEx	<b>Measures the percentage of mail assigned to the air network by the designated clearance time. This metric may include First-Class Mail Single-Piece Letters/Postcards, Presorted Letters/Postcards, Parcels, and Flats. It may also include Priority Mail and First-Class Package Service competitive products.</b>	95	02:30
On-time Trips	<b>Measures the on-time percentage of outbound trips from a mail processing facility between the designated times.</b>	88	00:00-07:00
Managed Mail Program (MMP) Cleared	<b>Measures the percentage of First-Class Mail Single-Piece Letters/Postcards and Presorted Letters/Postcards that have received a primary sortation by the designated clearance time.</b>	95	15:00 on the day before delivery
Delivery Point Sequence (DPS) second pass Cleared	Measures the percentage of First-Class Mail Single-Piece Letters/Postcards and Presorted Letters/Postcards that have received DPS sortation by the designated clearance time. It may also include Standard Mail Letters.	95	05:00 on the day of delivery
Carriers Returned	Measures the percentage of delivery unit carriers that return to the office by the designated time.	87	17:00 on the day of delivery

Source: ACD 2017 at 131.

The Commission viewed the 24-Hour Clock processing metrics as “useful for monitoring the relative speed of Postal Service network operations and allowing the Postal

Service to monitor service performance trends.” *Id.* at 129. It noted the Postal Service “reviews and adjusts the 24-Hour Clock targets. *Id.* at 131, note. It recognized that “mailpieces that do not achieve the 24-Hour Clock clearance targets may not necessarily arrive at their destination after the applicable service standard.” But failure to meet that standard reduces the confidence the mailpiece will be delivered on time. *Id.* at 132. Four processing operations were identified as having a “significant impact” on overall service performance results. *Id.* The Commission also found support in that focusing on one of the processing actions would improve service. *Id.* at 137. The Commission concluded that monitoring these indicators provide increased transparency into the mail flow and that the 24-Hour Clock is a “valuable tool for responding to local level operational issues and for qualitative analysis of the network. However, because the 24-Hour Clock did not disaggregate data by product (or service standard component) the quantitative analysis is limited. *Id.* at 142. Although that detail of information might prove useful, the information is not available or would be difficult to compile because many products and their respective service standards are mixed when entered for processing, or necessarily intermingled during processing.

The value of compiling national operating plan targets with the 24-Hour Clock has been demonstrated over several years of reporting pursuant to detailed Commission directives and requests for information during ACR proceedings. Their value is notable. The focus to date has been on First-Class Mail, but data for the other classes of delivered mail is very likely to be valuable for the Commission’s review and for the issuance of potential directives. If the data for processing mailpieces for the remaining classes that deliver mail is not already compiled by Postal Service management, that information would provide a new useful tool to improve service performance in the public interest.

New rules that would require First-Class Mail data already being produced in library references for the ACR and between ACR proceedings would not add unduly to the Postal Service’s responsibilities for its the Annual Compliance Report. But, although new rules for the other mail classes involving the processing and delivery of mail may require additional

effort and expense for the Postal Service, the advantages found with respect to First-Class Mail would certainly apply also to the other classes.

The Public Representative believes that data on the 24-Hour Clock processing metrics is necessary and relevant to the Commission's ACD process and should continue to be provided at least on an annual basis. However, for the purpose of informing the mailing public, particularly single-piece mailers, the Carrier Return time to the office is particularly of interest. This metric measures the percent of time carriers return to the office by 5 p.m. It is important for both carrier safety and to residential customer satisfaction because it likely indicates how late mail is being delivered. It is also not product dependent.

The Public Representative supports rules requiring the Postal Service to report the performance for each national operating plan target for all Market Dominant products. The Public Representative also suggests that 39 CFR § 3055.2 specify these data are to be provided at the most disaggregated level possible when useful to the public and mailers. At a minimum, the data should be reported quarterly and annually by legacy District and Area-geographic levels.

The Commission should therefore amend 39 CFR § 3055.2 regarding service performance achievements to include internal performance on the 24-Hour Clock within 39 CFR § 3055.2. The Public Representative suggests adding a series of requirements starting with a new subsection 3055.2(l) followed by additional subsections like the series of subsections (d) through (k) of § 3055.2, specifically tailored to gather the 24-Hour Clock data.

#### D. Reporting Requirements for Quality of Service of all Nonpostal Products

Pursuant to section 39 U.S.C. § 3705(a)(1), as codified by the PSRA,<sup>16</sup> the Commission requests comments on how best to effectuate the legislation's requirements in section 3704(b)(1) that the Commission prescribe the content and form of the newly required annual report for all nonpostal products."<sup>17</sup> The annual report is to include reports of new

---

<sup>16</sup> PSRA Section 103, Nonpostal Services amending Part IV of title 39, adding Chapter 37.

<sup>17</sup> The PSRA specifically provides that the Annual Report to the Commission and its contents as required by the new section 3705(a)-(d) also applies to all individual nonpostal services provided directly or through

agreements the Postal Service may enter into for the provision of property or nonpostal services with state and local governments under the new PSRA provision of law at 39 U.S.C. § 3703 and government agencies under 39 U.S.C. § 3704.<sup>18</sup> The required annual report applies not only to new nonpostal services entered into with governments or government agencies, but also to all current nonpostal services.<sup>19</sup> The PSRA requires the annual reports to analyze all nonpostal service costs, revenues, rates, and quality of service. Section 3704(a)(1). The PSRA does not distinguish between market dominant and competitive nonpostal product reporting. Although the Commission did not receive authority to approve or disapprove the new nonpostal services, the Commission will need to determine whether new nonpostal services authorized by the PSRA are market dominant or competitive for purposes of the Commission's review of the annual reports. That decision depends upon the nature of the service involved. In some cases, the Postal Service may dominate the market for the service offered; in others, such as the passport photo service which is a competitive service offered on behalf of another governmental entity, there may be competition for the service and the nonpostal service would be designated competitive.<sup>20</sup> Rules for requesting modification of the MCS product lists appear in 39 CFR Part 3040.

---

licensing that are continued under section 404(e) of title 39. See PSRA, Section 103(b) Conforming Amendments ... (3) Treatment of existing nonpostal services.

<sup>18</sup> The purpose of the PSRA is to foster agreements for the provision of property or nonpostal services under 39 U.S.C. 3705(a)(1) to "enable the Postal Service to increase its net revenues through specific nonpostal products and service that are expressly authorized by [chapter 37]." 39 U.S.C. § 3701 Purpose.

<sup>19</sup> PSRA Section 103(b) "Conforming Amendments" provides in subsection (3) Treatment of Existing nonpostal services.—All individual nonpostal services, provided directly or through licensing, that are continued pursuant to section 404(e) of title 39...shall be considered to be expressly authorized by chapter 37...and shall be subject to the requirements of section 3705, subsections (a) (through (d))" relating to transparency and accountability for nonpostal services.

<sup>20</sup> 39 U.S.C. § 404(e)(5) provides the Commission shall designate whether the service shall be regulated as a market dominant product or competitive product, but that section applies by its terms "If the Postal Regulatory Commission authorizes the Postal Service to continue a nonpostal service under this subsection." In the case of the new government or agency related nonpostal services, the Commission has no authority to authorize that service to continue.



The Postal Service currently reports in the ACR annually the costs, revenues and volumes for its nonpostal services.<sup>21</sup> Seven of the current nonpostal products are competitive.<sup>22</sup> Their revenues, costs and volumes, where appropriate, are reported in the ACR separately by the Postal Service and considered separately from two market dominant nonpostal products.<sup>23</sup> In the FY 2021 ACD the Commission determined the Competitive products satisfied 39 U.S.C. § 3633(a)(2) because revenues overall exceeded attributable cost for each product. FY 2021 ACD at 94. For the two market dominant products, revenues also exceeded costs. See FY 2021 ACR at 73.

*Market Dominant nonpostal services reporting.* There are currently no specific rules regarding the filing of reports for the performance of market dominant nonpostal services. The Advance Notice indicates the Commission is concerned in this docket with annual reporting requirements of service performance for market dominant nonpostal products.<sup>24</sup> The Commission indicated that it intends to set out the rules in reserved § 3055.25. Advance Notice at 6. However, § 3055.25 pertains only to the annual reporting of service performance for each Market Dominant product specified in the MCS, part 3040, appendix A to subpart A of part 30439 CFR §3055.1.

To comply with the PSRA regarding Market Dominant nonpostal product service performance, the Public Representative suggests the Commission insert into the reserved § 3055.25 the same language in comparable rules for annually reporting service performance

---

<sup>21</sup> Market Dominant nonpostal services are reported annually in the Postal Services FY ACR. See for instance FY 2020 at 73.

<sup>22</sup> The seven Competitive nonpostal products are: (1) Licensing of Intellectual Property other than Officially Licensed Retail Products; (2) Mail Service Promotion; (3) Officially Licensed Retail Products (OLRP); (4) Passport Photo Service; (5) Photocopying Service; (6) Rental, Leasing, Licensing or other Non-Sale Disposition of Tangible Property; and (7) Training Facilities and Related Services. Docket No. MC2010-24, Order Approving Mail Classification Schedule Descriptions and Prices for Nonpostal Service Products, December 11, 2012, at 4 (Order No. 1575). See FY 2021 ACD at 94 n.138.

<sup>23</sup> The market dominant nonpostal products are "Alliance with the Private Sector to Defray Costs (includes MoverSource nonpostal service] and Philatelic Sales. See United States Postal Service FY 2021 Annual Compliance Report (FY 2021 ACR) at 73.

<sup>24</sup> Quarterly reporting of nonpostal services is not required by the PSRA. The Commission does not request comment on potential rules for quarterly reporting of nonpostal products for the reserved section at 39 CFR 3055.70 of the rules.

for the other Market Dominant classes: First-Class Mail (§ 3055.20); Standard Mail (§ 3055.21); Periodicals (§ 3055.22); Package Services (§ 3055.23) and Special Services (§ 3055.24). Each section states, “For each product within the [nonpostal services] class, report the on-time service performance (as a percentage rounded to one decimal place).” This language would be sufficient to comply with the PSRA requirement to direct reporting of market dominant nonpostal service performance.

*Competitive nonpostal services reporting.* As for the PSRA requirement to report annually service performance of competitive nonpostal services, the PSRA has created somewhat of an anomaly. A report of service performance for competitive products is not required by the Commission’s rules. Service performance for competitive nonpostal services is not reported in the Annual Compliance Report. New rules to obtain competitive nonpostal service performance will be needed.

While a note might be added to § 3055.25 to state that the Market Dominant provision also applies to competitive nonpostal products, a solution more consistent with the framework of the rules would be to add language in the initial section of Subpart A of Part 3055. Section 3055.1, styled Annual Reporting of Service Performance Achievements. Adding an additional reference at that point for competitive nonpostal product service performance would satisfy the rule’s requirement for annual reporting of competitive nonpostal service performance. The Public Representative proposes that after the words in § 3055.1, “For each market dominant product specified in the Mail Classification Schedule in part 3040, appendix A to subpart A of part 3040 of this chapter, *insert* “and for each competitive nonpostal service product specified in the Mail Classification Schedule in part 3040, appendix B to subpart A of part 3040,” then continue with the current language, “the Postal Service shall file a report as part of the section 3652 report...” The Commission’s rules would therefore comply with the PSRA requirement on this point. It will be the Postal Service’s responsibility to file the appropriate service performance measurement data for its competitive nonpostal services. Nevertheless, there is an opportunity for relief to the Postal Service if service performance measurement is not feasible.

*Potential Exclusion from Measurement Reporting.* As noted above, service performance has not been required reporting for nonpostal services. The Commission has recognized there may be difficulties in establishing and providing service performance measurements for certain products that warrant exemption from such reporting requirements. Section 3055.3 provides for reporting exceptions where the cost of a measurement system would be prohibitive in relation to the revenue generated by the product, or the product defies meaningful measurement. The Commission's rules acknowledge that certain products, or components of products, should be excluded from measurement because requiring such measurements would be unnecessary, impractical, or would not further the goals and objectives of the PAEA. Rule 3055.3 provides the Postal Service the opportunity to request that a product, or component of a product, be excluded from service performance measurement reporting upon demonstration that:

- (1) The cost of implementing a measurement system would be prohibitive in relation to the revenue generated by the product, or component of the product;
- (2) The product, or component of a product, defies meaningful measurement; or
- (3) The product, or component of a product, is in the form of a negotiated service agreement with substantially all components of the agreement included in the measurement of other products.

The Commission has granted exclusions for an extensive list of Special Services upon the requisite Postal Service showing. Once granted, exceptions are semi-permanent in nature.<sup>25</sup> The Postal Service is not required to reapply for exceptions on a regular basis,

---

<sup>25</sup> The Commission has approved a semi-permanent exception for service measurement of the following Special Services: hard-copy Address Correction Service, Applications and Mailing Permits, Business Reply Mail, Bulk Parcel Return Service, Certificate of Mailing, Merchandise Return Service, Parcel Airlift, Restricted Delivery, Shipper-Paid Forwarding, Special Handling, Stamped Envelopes, Stamped Cards, Premium Stamped Stationery, Premium Stamped Cards, International Certificate of Mailing, outbound International Registered Mail, International Return Receipt, International Restricted Delivery, International Insurance in conjunction with Inbound Surface Parcel Post (at UPU Rates), Customs Clearance and Delivery Fee, Caller Service, Change of Address Credit Card Authorization, International Reply Coupon Service, International Business Reply Mail, and Money Orders (sales aspect of this service only, not inquiries). Docket No. RM2010-11, Order Concerning Postal Service Request for Semi-Permanent Exceptions from Periodic Reporting of Service Performance Measurement, September 30, 2010 (Order No. 531); Docket No. RM2010-14, Order Approving Semi-Permanent

barring changed circumstances. However, the Postal Service is required to periodically identify the products, or components of a product, granted exceptions and certify that the rationale for originally granting the exception remains valid.

E. Requiring Regular Reporting of Volumes Excluded from Measurement

1. Whether to require reporting of mail excluded from measurement disaggregated by reasons of exclusion from measurement.

Comments filed in response to the Commission's recent public inquiry regarding the Commission's dashboard in Docket No. PI2022-2 are instructive on the general question of whether to require reporting of mail excluded from measurement and disaggregated by reasons of exclusion from measurement. Post Com commented:

[a]lmost a third of mail is absent from reporting due to business rules, imposed by the Postal Service, that ultimately distort service measurement and present an unrealistically rosy picture of Postal Service performance . . . [w]hile the Postal Service may claim that business rules are required to "validate" mail for measurement, the Commission's dashboard could-and should-provide sufficient clarification to enable users of the system to make reasonable inferences regarding measurements based on edited versus raw data."<sup>26</sup>

Another commenter in that proceeding, NAPM, stated:

NAPM and others continue to advocate for mailers to have access to piece level data through Informed Visibility showing which pieces are excluded from measurement and why so that they can take action. Having more visibility into these types of data on mail excluded from measurement will bring more attention to issues around getting more

---

Exception from Periodic Reporting of Service Performance Measurement for Applications and Mailing Permits, October 27, 2010 (Order No. 570). Source: FY 2021 Service Performance Report at 25; FY 2020 Service Performance Report at 25. See FY 2021 ACD at 198, note.

<sup>26</sup> Docket No. PI2022-2, Comments of the Association for Postal Commerce, March 18, 2022 at 2 (Docket No. PI2022-2, PostCom Comments)

mail into measurement for more accurate service performance reporting.”<sup>27</sup>

Post Com suggested:

greater depth in reporting is possible, already available and that the following “disaggregation should be applied to pieces that USPS excludes from measurement....”.<sup>28</sup>

- Performance below the product level based on service type indicators
- Performance based on specific 3-Digit origin-destination pairs
- Performance by entry facility
- Performance by day of entry. *Id.*

In addition to supporting the above comments, the Public Representative has examined the Postal Service’s mail exclusion by cause and mail class for Fiscal Year 2022 quarter 2,<sup>29</sup> and the excluded from measurement product/service-standard volumes report for Fiscal Year 2022 quarter 1.<sup>30</sup> In the FY 22 Q1 Measured/Unmeasured Volume Report, for a large number of product/service-standards, it states that the Postal Service was either “Unable to Collect” for the “Total Number of Pieces Eligible for Full-Service IMb” (column D), the “Total Number of Full-Service IMb Pieces Excluded from Measurement” (column G) and/or the “Total Number of Pieces Not in Measurement” (column H).<sup>31</sup> The Public Representative believes that the Postal Service should explain and include with its Measured/Unmeasured Service Performance Report filings, the reasons why for each product and service-standard containing “Unable to Collect” in columns D, G and H, it is “Unable to Collect.” Therefore, the Public Representative supports including language in 39

---

<sup>27</sup> Docket No. PI2022-2 Comments of the National Association of Presort Mailers (NAPM), March 18, 2022 at 6 (Docket No. PI2022-2, NAPM Comments).

<sup>28</sup> PostCom suggests that the Commission should present service performance (from measured mail volume) to include these same disaggregated service performance data levels. Docket No. PI2022-2, PostCom Comments at 3.

<sup>29</sup> USPS Periodic Reports, FY 2022 Quarter 2 Service Performance Measurement Data, May 10, 2022, ZIP file “Q2 2022 SPM Filing 05.10.22.zip,” Excel file “AttachA\_ExclusionReasonBreakdown\_FY22\_Q2.xlsx.”

<sup>30</sup> USPS Periodic Reports, FY 2022 Q1 Service Performance Measurement System – Audit Report, Audit Responses, and Measured/Unmeasured Report, February 28, 2022, Excel file “FY22 Q1\_MeasUnMeasVolsRpt.xlsx” (FY22 Q1 Measured/Unmeasured Volume Report).

<sup>31</sup> See FY22 Q1 Measured/Unmeasured Volume Report, tab “FY22Q1.”

CFR § 3055 Parts A and B requiring explanations of “Unable to Collect.” However, it seems prudent at this time to obtain more information surrounding “Unable to Collect” and investigating the availability of disaggregated, useful data (to potentially include in the rule) because these factors may influence the content of reporting rules regarding volumes excluded from measurement.

## 2. Modifications to the Postal Service’s measurement systems.

The PSRA mandates that the Commission provide “recommendations for any modifications to the Postal Service’s measurement systems necessary to measure and publish the performance information” located on the dashboard. 39 U.S.C. 3692(b).<sup>32</sup> The Public Representative recommends that the Postal Service identify in its current quarterly service performance reporting those Districts failing to meet current audit criteria and identify the specific audit criteria each District fails to meet.

To make more informed recommendations on the changes needed to the Postal Service’s current measurement system, the Public Representative recommends the Commission consider obtaining service-performance information that identifies those Districts that fail to meet current audit measurement criteria at the weekly and quarterly level. For instance, failures to meet certain audit measurement criteria are:

- Measure 11 (Last Mile) District has a limited volume for which imputed results are used...<sup>33</sup>
- Measure 2 (First Mile) carrier sampling weekly compliance rates should consistently exceed 80 percent for most districts;<sup>34</sup>
- Measure 5 (Last Mile) carrier sampling weekly compliance rates should consistently exceed 80 percent for most districts;<sup>35</sup>

---

<sup>32</sup> The PSRA also requires the Commission to present recommendations to the Postal Service for its dashboard, discussed below.

<sup>33</sup> The current Audit Measure 11 (Last Mile) criteria states that “Most Districts should have a limited volume for which imputed results are used within the quarter.” See USPS Reports FY 2022 Q1 Service Performance Measurement – Audit Report, Audit Response and Measured/Unmeasured Volumes, February 28, 2022, PDF file “FY22 Q1 Audit Validation – Legacy.pdf” at 4. (FY22 Q1 Audit Report).

<sup>34</sup> FY22 Q1 Audit Report at 3.

<sup>35</sup> *Id.* at 3-4.

- Measure 23 (Processing Duration) at least 70 percent of the volume is measured for each product;<sup>36</sup>

*Postal Service's Use of Proxy Data and Imputation for the Internal SPM.*<sup>37</sup> In its Service Performance Methodology Report, the Postal Service describes its use of proxy data and imputation (in the Internal SPM):

While there are billions of mail pieces measured in the processing performance profile, the volume of data available for First Mile or Last Mile is much smaller because it is limited to only those pieces selected for sampling. FY21-29 Service Performance Methodology Report” at 6.

The First Mile and Last Mile profiles are applied to the Processing Duration data based on a fairly granular level of aggregation. Business rules have been developed to help ensure the data to estimate First Mile and Last Mile Impact are sufficiently robust. These include the following: • Imputation logic – For the calculation of the First Mile and Last Mile performance profiles, specific thresholds are used to identify when data are missing or insufficient to provide reliable estimates. When the volume is below a defined threshold, the next highest geographic region is used as the imputed profile. *Id.*

If a proxy measure is applied, the Commission should consider requiring a report of the measurement component where the proxy was needed (and why) and a description of the proxy (*i.e.*, the grouping levels used).

The Public Representative also recommends that the Commission obtain additional information about the grouping of data for the “Mail Processing Duration” component of the Internal SPM. It is not clear when and how frequently or for what mail products/service standards the Postal Service uses--combined overall Postal Areas mail processing results (either as a proxy or routinely) or more geographic-district specific mail processing results. Because of the variation in the types, configurations of machines and productivity at different

---

<sup>36</sup> *Id.* at 5. This may not be possible to determine at the weekly and district level given the sample design of the RPW and another audit indicator may need to be developed.

<sup>37</sup> SPM is Service Performance Measurement. The Postal Service currently uses three service performance measurement systems. See FY 2021 ACD at 129.

facilities that may do the same type of processing, the use of combined Postal Areas mail processing results where geographic differences may exist is of concern.<sup>38</sup>

*Suggested Revision to 39 CFR Subpart A-Annual Reporting of Service Performance Achievements (Proposed 2<sup>nd</sup> sentence added in italics):*

§ 3055.2 Contents of the annual report of service performance achievements.

\* \* \*

(e)(5) Where proxies are used, a description of and justification for the use of each proxy. *If a proxy has been used during the fiscal year, the Postal Service should also specify: the time period the proxy was used, the Postal Service District or Districts for which the proxy was used, the measurement component, product or service-standard the proxy replaced and the specific proxy used (including the District(s) or Area(s) from which it was developed).*

3. Requiring regular reporting of measured and unmeasured Full Service Intelligent Mail barcode (IMb) volumes.

As part of the Commission's ACD process, the Postal Service has supplied the Commission with quarterly data on the percentage of mailpieces by product, that are measured by utilizing IMb data.<sup>39</sup> Full-Service IMb generates electronic scan data that can be used to track mailpieces as they pass through automated scan operations. Mailers receive a discount for applying an IMb to mailpieces prior to entering them into the mailstream. ACD FY2021 at 132. In the FY 2021 ACD the Commission expressed its view that, "The percentage of mail entered at Full-Service IMb and included in measurement conveys a concerning pattern. There was a decline between FY 2020 and FY 2021 for all products. The two largest declines occurred for High Density and Saturation Flats/Parcels and Bound Printed Matter Flats, with declines of 10.24 and 21.66 percentage points,

---

<sup>38</sup> See Docket No. RM2020-1, Responses of the United States Postal Service to Questions 1-16 of CHIR No. 3, June 10, 2020, questions 2.b., 4, and 5. See also [IMb Planning Tool \(usps.com\)](https://usps.com/IMbPlanningTool). The presence and productivity of certain machines such as the FSS conceivably may also influence mail processing duration time. See Docket No. ACR2021, Library Reference USPS-FY21-23, folder "Programs," Excel file "mods2021prod\_prescreen.xlsx," compare site id (masked facility id), for the month of December, operation 538 (FSS DPS mode), productivity = (Total Pieces Fed (TPF)/per employee workhour clocked to MODS operation code 538): in December of 2021, site id 195 productivity was less than one-third the productivity of site id 155.

<sup>39</sup> This does not include First-Class Single-Piece Letters and Cards.



respectively.” FY 2021 ACD at 134. It pointed out that, generally, the more mailpieces that are measured, the more representative, accurate, and reliable such measurements will be. The Commission continues to monitor mailpieces excluded from measurement and requires the Postal Service to provide regular, detailed information concerning mailpieces included and excluded from measurement as well as the reasons for exclusion.

The Public Representative believes that the volume of mailpieces excluded from measurement down to the district level and the reasons why should be reported quarterly to the Commission.

### III. ONLINE DASHBOARD MANDATE FOR POSTAL SERVICE

#### A. The PSRA requires the Postal Service to implement an online dashboard.

The PSRA requires that the Postal Services Dashboard shall include plain language descriptions of the elements required under 39 U.S.C. § 3692(c)(2) and comprehensive information on the collection process, measurement methodology, completeness, accuracy, and validity of the performance information provided on the website. 39 U.S.C. § 3692(c)(3). Currently, the Postal Service provides some information related to the service performance data limitations in its annual and periodic reports and on its website. Because some of the public information related to the completeness, accuracy and validity of the information provided is very general, the Public Representative recommends that the Postal Service seek public input on this specific type of information; including considering conducting a focus group to assess not only the plain language descriptions, but the public’s perception of the completeness, accuracy, and validity of the service performance “limitations” information presented on the PSRA dashboard.<sup>40</sup>

---

<sup>40</sup> For example, in its “Limitations” section of the FY 2022 quarter 2 USPS Marketing Mail (composite) service performance report, the Postal Service states: “Due to limited automated processing for USPS Marketing Mail® Flats, the service performance results may not be representative of all USPS Marketing Mail® Flats performance. While Destination Delivery Unit (DDU) entered Saturation Flats and EDDM Retail® Flats have been included this quarter, significant gaps in the coverage of non-Saturation/non-EDDM Retail® DDU Entry mail still remain and are excluded from measurement. Results for USPS Marketing Mail® Parcels, which represent less than 0.1percent of all USPS Marketing Mail®, are not included in the overall USPS Marketing Mail® results.”

Under the current methodology and reporting, the Postal Service provides the quarterly District-level service performance results 95 percent confidence interval.<sup>41</sup> It would be helpful if the Postal Service provided more information as it relates to the margin of error at the weekly level of service performance reporting. The Public Representative suggests that the specific District-level 95 percent confidence interval for the service performance results be linked to the service performance results presented in the PSRA dashboard.<sup>42</sup>

The Public Representative recognizes that designing a good dashboard is difficult and involves trade-offs. A large quantify of information is required by the PSRA, but it must be accessible, meaningful and understandable by users. The dashboard likely may require several parts depending upon the audience and likely users. For the public, the dashboard must first and foremost be easily locatable on the Postal Service website and available when opened. Further, it must be easy to use and understandable with explanations available.

Links are currently available on the Postal Service website for ZIP Code to ZIP Code service standards. There is no doubt the first question by many First-Class Mail letter mailers is what is the mailpiece delivery date. It is assumed the dashboard follows strictly the published service performance standards. If there is a deviation from standards, that should be clearly explained on the dashboard. It appears there are significant differences between the published standards and the expected delivery dates for individual ZIP Code pairs.<sup>43</sup> A

---

Given this limitations description, the reader does not know whether any or if some of the District-level service performance results presented are accurate, valid, representative or reliable. See USPS Periodic Reports, FY 2022 Quarter 2 Service Performance Data, May 10, 2022, Zip file "Q2 2022 SPM Filing 05.10.22.zip," Zip file "fy2022-q2-performance\_usps.com-pdf-files.zip," PDF file "fy2022-q2-marketing-mail-quarterly-performance.pdf" at 1.

<sup>41</sup> See Audit Measure 15 Reporting and Processing Duration Quarterly Results Precision Districts where margin of error exceeds the target level. USPS Periodic Reports, FY 2022 Q1 Service Performance Measurement System – Audit Report, Audit Responses, and Measured/Unmeasured Report, February 28, 2022, Excel file "FY22 Q1\_MeasUnMeasVolsRpt.xlsx" (FY22 Q1 Measured/Unmeasured Volume Report).

<sup>42</sup> See USPS Periodic Reports, FY 2022 Quarter 2 Service Performance Data, May 10, 2022, Zip file "Q2 2022 SPM Filing 05.10.22.zip," Zip file "FY22 Q2 SPM Reports.zip," Zip file "Marketing Mail," Excel file "USPS Marketing Mail-Flats 222 Scores Report.xlsx," tab "MM Quarter."

<sup>43</sup> The Public Representative's recent experience accessing the estimated ZIP Code pairs delivery dates on the Postal Service's Service Commitments dashboard found no relationship between an anticipated 3 days for delivery and the estimated 7 days listed for delivery of a First-Class Mail letter, between ZIP codes 135 miles apart within a populated area, 10 miles from the President's summer home in Delaware to a suburb of

more elaborate dashboard would indicate where there are significant changes from expected performance and would indicate the prior week's and year's performances for ZIP Code pairs.

Several commenters in Docket No. PI2022-2, relating to the Commission's own dashboard test, stated that more information related to the numbers of days to delivery should be included on the (PRC) dashboard. Specifically, PostCom proposes "evaluating service relative to targets by reporting average days to delivery at the levels of specificity identified above." Docket No. PI2022-2, PostCom Comments at 4. Lexington Institute stated that it should be stated in "clear terms how much longer, in terms of days mail is now taking to be delivered in various areas."<sup>44</sup> NAPM noted that for service-performance dashboard tools designed to be used by the general public, "there needs to be more explanations included so the user understands what is being presented and how to interpret the data."<sup>45</sup> Docket No. PI2022-2, Comments of NAPM at 4. They also suggested that "[i]t would be useful for the general consumer if there were some discussion of how they might use the dashboard, for what purpose, and an overview of what the data means." *Id.*

In its Docket No. PI2022-2 Comments, NAPM identified five current publicly available service-performance data tools, four of which present the same quarterly data output from the Postal Service's service performance measurement system. Docket No. PI2022-2, NAPM Comments at 2-3. However, because each service-performance data tool shows the

---

Washington D.C., 18 miles from the White House in lower Montgomery County Md., a drive time of 2.5 hours. Even allowing for additional driving if routed through Baltimore to Montgomery County, based on the stated standards, delivery days should be no more than 4 days. The 7-day delivery estimate for a First-Class Mail letter trip of 135 miles is inexplicable. See ATTACHMENT generated from the Postal Service's Postal Explorer tool, Service Commitments.

<sup>44</sup> Docket No. PI2022-2, Comments of the Lexington Institute, March 18, 2022 at 2 (Docket No. PI2022-2, Lexington Institute Comments).

<sup>45</sup> NAPM suggests that "it would be helpful to either use hyperlinks to the applicable definitions when used in each section of the dashboard or some other technique to make it more user-friendly." See Docket No. PI2022-2, Comments of the National Association of Presort Mailers at 4 (Docket No. PI2022-2, NAPM Comments).

data in a different manner, has different features and presents the data in different formats, it is “imperative that there be consistency in how the data is interpreted (particularly since it is the same data) otherwise the outcome will be confused and frustrated users.” Docket No. PI2022-2, NAPM Comments at 3. The Public Representative agrees that an explanation on how to interpret and how the data on PSRA dashboard differs from the quarterly and annual reports would be helpful to include on the PSRA dashboard.

The Public Representative agrees with the Docket No. PI2022-2 commenters that the information and explanations included with a service performance dashboard generally should help users understand why their service-performance experience may or may not differ from the service-performance results available on a dashboard (or presented in the quarterly or annual reports).<sup>46</sup>

The Public Representative suggests that the PSRA dashboard (and reports) include a key (or a link to a document) that shows how the user’s ZIP Code is grouped to the Postal Service Districts and Areas.<sup>47</sup> By doing so, the Public Representative believes that users will be better equipped to understand service performance results aggregated at higher levels in the Postal Service’s quarterly and annual service performance reports to the Commission.<sup>48</sup> The Postal Service states that “information tying Areas and Districts to a 3-or 5-digit ZIP Code information is already available on the Postal Service’s public website.” Docket PI2022-2, Postal Service Reply Comments at 5. However, the Public Representative attempted to access the website link the Postal Service provided in Docket PI2022-2 over a period of several days, and received an automated message each time stating that

---

<sup>46</sup> NAPM states that “[w]e often have NAPM member customers that see high level aggregated service performance data, for example, that question our members as to why their specific service experience is so different. It is certain that a member of the general public would ask the same question if they are trying to reconcile the service they are experiencing with what is being reported on the PRC dashboard.” Docket No. PI2022-2, NAPM Comments at 4.

<sup>47</sup> See also Docket No. PI2022-2, Comments of the Public Representative, March 18, 2022 at 1-2 (PI2022-1, PR Comments).

<sup>48</sup> In the Docket PI2022-2, Reply Comments of the United States Postal Service, April 18, 2022 at 5 n.11 (Docket PI2022-2, Postal Service Reply Comments).

“postalpro.usps.gov’s server IP address could not be found.”<sup>49</sup> Given the Postal Service’s planned network changes,<sup>50</sup> it is imperative that a mechanism is in place to keep the information on the PSRA dashboard (including the information tying Areas and Districts to 3- or 5-Digit ZIP Codes) current and active.

The Public Representative believes that the Postal Service’s PSRA dashboard needs to include a simple way for users to identify expected days to delivery given where the mail originates and destines. The Postal Service currently has an “IMb Planning Tool” that shows weekly delivery days performance given an entry facility, and the percentages that are delivered in varying delivery days.<sup>51</sup> It is not clear if something like this could be adapted to the PSRA dashboard. If so, the Public Representative believes the data and search functions presented on this site are quickly and easily comprehended and could potentially help some users determine the expected range of delivery days (and how successful the Postal Service is at meeting those targets).

#### B. Requirements for Specific Data to Measure and Publish Performance Information for Dashboard

As part of the Commission’s ACD process, the Postal Service has supplied the Commission with quarterly data on the percentage of mailpieces by product, that are measured by utilizing IMb data.<sup>52</sup> Full-Service IMb generates electronic scan data that can be used to track mailpieces as they pass through automated scan operations. Mailers receive a discount for applying an IMb to mailpieces prior to entering them into the mailstream. ACD FY2021 at 132. The Postal Service should provide data to the public

---

<sup>49</sup> The Public Representative attempted to access over 3 days (May 31, June 1, June 2, 2022), the website link the Postal Service provided for the ZIP Code information tying Postal Areas and Districts provided in its Docket PI2022-2, Postal Service Reply Comments at 5, n. 11, and the link did not function. An automated message appeared after clicking on the link stating that “postalpro.usps.gov’s server IP address could not be found.”

<sup>50</sup> See *DeJoy outlines USPS plans to close, consolidate facilities across its delivery network*, Federal News Network, May 18, 2022, url:<https://federalnewsnetwork.com/facilities-construction/2022/05/dejoy-outlines-usps-plans-to-close-consolidate-facilities-across-its-delivery-network/>

<sup>51</sup> url: [IMb Planning Tool \(usps.com\)](https://postalpro.usps.gov/IMbPlanningTool)

<sup>52</sup> This does not include First-Class Single-Piece Letters and Cards.

through its dashboard by quarter, and by product, at the district level. However, for the dashboard, it would not be necessary to report on a real-time basis the reasons for exclusion from measurement.

#### IV. CONCLUSION

The Public Representative presents the foregoing Comments for the Commission's consideration in this proceeding.

Respectfully submitted,

Kenneth E. Richardson  
Public Representative

Manon A. Boudreault  
Kenneth R. Moeller  
Assisting the Public Representative

901 New York Avenue, N.W.  
Suite 200  
Washington, D.C. 20268-0001  
Phone: (202) 789-6859  
kennethrichardson@prc.gov

## ATTACHMENT



What ZIP Code are you mailing from? 19966  
 What ZIP Code are you mailing to? 20854  
 What Date do you plan to mail the item? 6/3/2022  
 What's the Time you plan to mail the item? between 10:00 a.m. - 10:30 a.m.

**Priority Mail Express**


---

 Priority Mail Express - Money Back Guarantee

---

 Priority Mail Express Hold for Pickup - Money Back Guarantee

---

Drop-Off By	Facility Type	Address
Fri, Jun 3 by 2:30 PM	POST OFFICE	100 MAIN ST, MILLSBORO, DE 19966

[Show Additional Drop-Off Locations](#)

USPS.com home Service Commitments

Video Library Video Library

What ZIP Code are you mailing from?

19966

What ZIP Code are you mailing to?

20854

What Date do you plan to mail the item?

6/3/2022

What's the Time you plan to mail the item?

between 10:00 a.m. - 10:30 a.m.

Priority Mail Express

Scheduled Delivery Day

Priority Mail Express - Money Back Guarantee Sat, Jun 4 by 6:00 PM

Priority Mail Express Hold for Pickup - Money Back Guarantee

Sat, Jun 4 by

6:00 PM

Drop-Off By

Facility Type

Address

Guarantee

Fri, Jun 3 by 2:30 PM	POST OFFICE	100 MAIN ST,	
MILLSBORO, DE 19966	Money Back Guarantee		
Show Additional Drop-Off Locations			
Priority Mail	Expected Delivery Day		
Priority Mail	Mon, Jun 6		
Priority Mail Hold for Pickup	Mon, Jun 6		
Drop-Off By	Facility Type	Address	Guarantee
Fri, Jun 3 by 5:00 PM	POST OFFICE	100 MAIN ST,	
MILLSBORO, DE 19966	No Guarantee		
Show Additional Drop-Off Locations			
First-Class Mail	Expected Delivery Day		
First-Class Mail	Fri, Jun 10		
Package Services	Expected Delivery Day		
Package Services	Wed, Jun 8		
First-Class Mail letters	Expected Delivery Day		
- Money Back Guarantee	Wed, Jun 8		
Hold for Pickup - Money Back Guarantee	Wed, Jun 8		
Mon, Jun 6			
Hold for Pickup	Mon, Jun 6		
First-Class Mail Flats	Expected Delivery Day		
Mon, Jun 6			
Hold for Pickup	Mon, Jun 6		
First-Class Mail Cards	Expected Delivery Day		
Mon, Jun 6			
Hold for Pickup	Mon, Jun 6		
First-Class Mail Package Service	Expected Delivery Day		
Mon, Jun 6			
Hold for Pickup	Mon, Jun 6		